UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v-

QUIRINO ERNESTO PAULINO CASTILLO,
a/k/a "El Don,"
LUIS EDUARDO RODRIGUEZ CORDERO
a/k/a "Principe,"
LUIS DAVID ULLOA,
a/k/a "Junior,"
JEAN PAUL ULLOA,
BLADIMIR GARCIA JIMENEZ
a/k/a "Vladi,"
JUAN SAMUEL RODRIGUEZ CORDERO,
a/k/a "Sammy,"
FEDERICO MIRANDA HERNANDEZ
a/k/a "Fede,"
JOSE ORTEGA DELEON,
a/k/a "Chico,"
JUAN CRUZ CRISOSTOMO,
RAMON PEREZ FERRERAS,
FATIMA HENRIQUEZ DIAZ,
FAUSTINO PEROSO,
a/k/a "Ventura,"
MARCOS TAVERAS JIMENEZ,
JOSE ABEL BURDIEZ DELEON,
RICHARD MEJIA PENA,
TIRSO CUEVAS NIN, and
LIDIO ARTURO NIN TERRERO,

Defendants.

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UNDER SEAL

SUPERSEDING INDICTMENT

S7 04 Cr. 1353 (KMW)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: ______
DATE FILED: 3-15-05

COUNT ONE

The Grand Jury charges:

1. From as early as September 2003, through and including in or about May 2004, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," LUIS DAVID ULLOA, a/k/a "Junior," JEAN PAUL ULLOA, BLADIMIR

GARCIA JIMENEZ, "Vladi," JUAN SAMUEL RODRIGUEZ CORDERO, a/k/a "Sammy," FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," and JOSE ORTEGA DELEON, a/k/a "Chico," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly, did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," LUIS DAVID ULLOA, a/k/a "Junior," JEAN PAUL ULLOA, BLADIMIR GARCIA JIMENEZ, "Vladi," JUAN SAMUEL RODRIGUEZ CORDERO, a/k/a "Sammy," FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," and JOSE ORTEGA DELEON, a/k/a "Chico," the defendants, and others known and unknown, would and did import into the United States from a place outside thereof a controlled substance, to wit, 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, in violation of Sections 812, 952 and 960(b)(1)(B) of Title 21, United States Code.

3. It was further a part and an object of the conspiracy that QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," LUIS DAVID ULLOA, a/k/a "Junior," JEAN PAUL ULLOA, BLADIMIR GARCIA JIMENEZ, "Vladi," JUAN SAMUEL RODRIGUEZ CORDERO, a/k/a "Sammy," FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," and JOSE ORTEGA DELEON, a/k/a "Chico," the defendants, and others known and unknown, would and did distribute a controlled substance, to wit, five kilograms and

more of mixtures and substances containing a detectable amount of cocaine, intending and knowing that such controlled substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation of Sections 959, 960(a)(3) and 960(b)(1)(B) of Title 21 of the United States Code.

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about September 23, 2003, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," and LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "El Principe," had a telephone conversation regarding, among other things, a shipment of cocaine that was to be delivered to JUAN SAMUEL RODRIGUEZ CORDERO, a/k/a Sammy," in New York City.

b. On or about September 24, 2003, DAVID ULLOA, a/k/a "Junior," and LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "El Principe," had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

c. On or about September 24, 2003, LUIS DAVID ULLOA, a/k/a "Junior," and JUAN SAMUEL RODRIGUEZ CORDERO, a/k/a "Sammy," had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO

MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

d. On or about September 27, 2003, LUIS DAVID ULLOA, a/k/a "Junior," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "El Principe," and FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

e. On or about September 27, 2003, LUIS DAVID ULLOA, a/k/a "Junior," and JEAN PAUL ULLOA had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

f. On or about October 9, 2003, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," and LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "El Principe," had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

g. On or about October 9, 2003, LUIS EDUARDO RODRIGUEZ COREDERO, a/k/a "El Principe," BLADIMIR GARCIA JIMENEZ, "Vladi," and FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

h. On or about October 16, 2003, JOSE ORTEGA DELEON, a/k/a "Chico," and FEDERICO MIRANDA HERNANDEZ, a/k/a

"Fede," had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

(Title 21, United States Code, Section 963.)

COUNT TWO

The Grand Jury further charges:

5. From as early as September 2003, through and including in or about May 2004,QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," LUIS DAVID ULLOA, a/k/a "Junior," JEAN PAUL ULLOA, BLADIMIR GARCIA JIMENEZ, "Vladi," JUAN SAMUEL RODRIGUEZ CORDERO, a/k/a "Sammy," FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," and JOSE ORTEGA DELEON, a/k/a "Chico," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly, did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

6. It was a part and an object of the conspiracy that QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," LUIS DAVID ULLOA, a/k/a "Junior," JEAN PAUL ULLOA, BLADIMIR GARCIA JIMENEZ, "Vladi," JUAN SAMUEL RODRIGUEZ CORDERO, a/k/a "Sammy," FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," and JOSE ORTEGA DELEON, a/k/a "Chico," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, in violation

of Sections 812, 841(a)(1) and 841(b)(1)(A) of Title 21, United States Code.

Overt Acts

7. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about September 23, 2003, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," and LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "El Principe," had a telephone conversation regarding, among other things, a shipment of cocaine that was to be delivered to JUAN SAMUEL RODRIGUEZ CORDERO, a/k/a Sammy," in New York City.

b. On or about September 24, 2003, DAVID ULLOA, a/k/a "Junior," and LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "El Principe," had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

c. On or about September 24, 2003, LUIS DAVID ULLOA, a/k/a "Junior," and JUAN SAMUEL RODRIGUEZ CORDERO, a/k/a "Sammy," had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

d. On or about September 27, 2003, LUIS DAVID ULLOA, a/k/a "Junior," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "El Principe," and FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

e. On or about September 27, 2003, LUIS DAVID ULLOA, a/k/a "Junior," and JEAN PAUL ULLOA had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

f. On or about October 9, 2003, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," and LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "El Principe," had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

g. On or about October 9, 2003, LUIS EDUARDO RODRIGUEZ COREDERO, a/k/a "El Principe," BLADIMIR GARCIA JIMENEZ, "Vladi," and FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

h. On or about October 16, 2003, JOSE ORTEGA DELEON, a/k/a "Chico," and FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," had a telephone conversation regarding, among other things, a shipment of cocaine that had been delivered to FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," in New York City.

(Title 21, United States Code, Section 846.)

COUNT THREE

The Grand jury further charges:

8. From as early as September 2003 up to and including in or about October 2003, in the Southern District of New York and elsewhere, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," LUIS DAVID ULLOA, a/k/a "Junior," JUAN CRUZ CRISOSTOMO, RAMON PEREZ FERRERAS, FATIMA HENRIQUEZ DIAZ, FAUSTINO PEROZO, a/k/a "Ventura," MARCOS TAVERAS JIMENEZ, JOSE ABEL BURDIEZ DELEON, and RICHARD MEJIA PENA, the defendants, along with others known and unknown, unlawfully, wilfully and knowingly did combine, conspire, confederate and agree together and with each other to violate Section 1956(a)(1)(A)(i), (B)(i) and 1957(a) of Title 18, United States Code.

9. It was a part and an object of the money laundering conspiracy that QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," LUIS DAVID ULLOA, a/k/a "Junior," JUAN CRUZ CRISOSTOMO, RAMON PEREZ FERRERAS, FATIMA HENRIQUEZ DIAZ, FAUSTINO PEROZO, a/k/a "Ventura," MARCOS TAVERAS JIMENEZ, JOSE ABEL BURDIEZ DELEON, and RICHARD MEJIA PENA, the defendants, along with others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, the transfer of tens of thousands of dollars in cash, represented the proceeds of some form of unlawful activity, unlawfully, wilfully, and knowingly would and

did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, knowing that the transactions were designed in whole or in part to promote the carrying on of said specified unlawful activity, in violation of Section 1956(a)(1)(A)(i) of Title 18, United States Code.

10. It was further a part and an object of the money laundering conspiracy that QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," LUIS DAVID ULLOA, a/k/a "Junior," JUAN CRUZ CRISOSTOMO, RAMON PEREZ FERRERAS, FATIMA HENRIQUEZ DIAZ, FAUSTINO PEROZO, a/k/a "Ventura," MARCOS TAVERAS JIMENEZ, JOSE ABEL BURDIEZ DELEON, and RICHARD MEJIA PENA, the defendants, along with others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, the transfer of tens of thousands of dollars in cash, represented the proceeds of some form of unlawful activity, unlawfully, wilfully, and knowingly would and did conduct and attempt to conduct financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, in violation of Section 1956(a)(1)(B)(i) of Title 18, United States Code.

11. It was further a part and an object of the money

laundering conspiracy that QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," LUIS DAVID ULLOA, a/k/a "Junior," JUAN CRUZ CRISOSTOMO, RAMON PEREZ FERRERAS, FATIMA HENRIQUEZ DIAZ, FAUSTINO PEROZO, a/k/a "Ventura," MARCOS TAVERAS JIMENEZ, JOSE ABEL BURDIEZ DELEON, and RICHARD MEJIA PENA, the defendants, along with others known and unknown, in an offense involving and affecting interstate and foreign commerce, unlawfully, wilfully and knowingly would and did engage and attempt to engage in monetary transactions in criminally derived property that was of a value greater than $10,000 and that was derived from specified unlawful activity, to wit, narcotics trafficking, in violation of Title 18, United States Code, Section 1957(a).

THE MEANS AND METHODS OF THE CONSPIRACY

12. Among the means and methods by which QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," LUIS DAVID ULLOA, a/k/a "Junior," JUAN CRUZ CRISOSTOMO, RAMON PEREZ FERRERAS, FATIMA HENRIQUEZ DIAZ, FAUSTINO PEROZO, a/k/a "Ventura," MARCOS TAVERAS JIMENEZ, JOSE ABEL BURDIEZ DELEON, and RICHARD MEJIA PENA, the defendants, and their co-conspirators would and did carry out the conspiracy were the following:

a. Narcotics were imported from the Dominican Republic into and sold in the United States, including in New York City.

b. The proceeds from those sales were then collected in the United States and delivered to representatives of the organization in among other places, New York City.

c. These drug proceeds were then repatriated back to the Dominican Republic by, among other means, wire transferring the proceeds to various bank accounts in the Dominican Republic.

d. Once the money had been received via wire transfer, the drug proceeds were withdrawn by the account holder or his/her representative.

e. The proceeds were then delivered by the account holder or his/her representative to the individual who owned the narcotics which had been sold, including to, among others, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," and LUIS DAVID ULLOA, a/k/a "Junior."

f. The proceeds were often exchanged in face to face meetings occurring in parking lots or bus terminals at which duffle bags containing hundreds of thousands of dollars in drug proceeds were exchanged.

Overt Acts

13. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about September 11, 2003, LUIS DAVID ULLOA, a/k/a "Junior" and JUAN CRUZ CRISOSTOMO had a telephone conversation regarding, among other things, narcotics proceeds that CRISOSTOMO was handling for ULLOA.

b. On or about September 12, 2003, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," and LUIS DAVID ULLOA, a/k/a "Junior," had a telephone conversation regarding, among other things, making arrangements for a delivery of narcotics proceeds.

c. On or about September 16, 2003, LUIS DAVID ULLOA, a/k/a "Junior," and RAMON PEREZ FERRERAS had a telephone conversation regarding, among other things, narcotics proceeds that PEREZ and CRISOSTOMO was handling for ULLOA.

d. On or about September 17, 2003, in the Dominican Republic, LUIS DAVID ULLOA, a/k/a "Junior," received a bag containing approximately $200,000 in narcotics proceeds from CRISOSTOMO, who was accompanied by PEREZ.

e. On or about September 17, 2003, LUIS DAVID ULLOA, a/k/a "Junior," and JUAN CRUZ CRISOSTOMO had a telephone conversation regarding, among other things, making arrangements for a delivery of narcotics proceeds.

f. On or about September 18, 2003, in the Dominican Republic, LUIS DAVID ULLOA, a/k/a "Junior," received a bag containing approximately $200,000 in narcotics proceeds from MARCOS TAVERAS JIMENEZ.

g. On or about September 23, 2003, LUIS DAVID ULLOA, a/k/a "Junior," and JOSE ABEL BURDIEZ DELEON had a telephone conversation regarding, among other things, making arrangements for narcotics proceeds to be delivered to ULLOA by RICHARD MEJIA PENA.

h. On or about September 23, 2003, in the Dominican Republic, LUIS DAVID ULLOA, a/k/a "Junior," received a bag containing approximately $200,000 in narcotics proceeds from RICHARD MEJIA PENA.

i. On or about September 29, 2003, LUIS DAVID ULLOA, a/k/a "Junior," and FATIMA HENRIQUEZ DIAZ had a telephone conversation regarding, among other things, making arrangements for narcotics proceeds to be delivered to ULLOA.

j. On or about September 30, 2003, in the Dominican Republic, LUIS DAVID ULLOA, a/k/a "Junior," received a bag containing approximately $100,000 in narcotics proceeds from CRISOSTOMO.

k. On or about October 15, 2003, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," and " LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," had a telephone conversation regarding, among other things, making arrangements for a delivery of narcotics proceeds the following day.

l. On or about October 16, 2003, in the Dominican Republic, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," accompanied by "LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," received a bag containing approximately $500,000 in narcotics proceeds from LUIS DAVID ULLOA, a/k/a "Junior."

m. On or about October 17, 2003, FATIMA HENRIQUEZ DIAZ and FAUSTINO PEROZO, a/k/a 'Ventura," had a telephone conversation regarding, among other things, a dispute about the amount of narcotics proceeds that CRISOSTOMO had delivered to PEROZO.

(Title 18, United States Code, Section 1956(h).)

COUNT FOUR

14. In or about December 2004, in the Dominican Republic and elsewhere, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," TIRSO CUEVAS NIN, and LIDIO ARTURO NIN TERRERO, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

15. It was a part and an object of the conspiracy that QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," TIRSO CUEVAS NIN, and LIDIO ARTURO NIN TERRERO, the defendants, and others known and unknown, would import into the United States from a place outside thereof a controlled substance, to wit, 5 kilograms and more of a mixture and substance containing a detectable amount of cocaine, in violation of Sections 812, 952 and 960(b)(1)(B) of Title 21, United States Code.

16. It was further a part and an object of the conspiracy that QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," TIRSO CUEVAS NIN, and LIDIO ARTURO NIN TERRERO, the defendants, and others known and unknown, would and did distribute a controlled substance, to wit, five kilograms and more of mixtures and substances containing a detectable amount of cocaine,

intending and knowing that such controlled substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation of Sections 959, 960(a)(3) and 960(b)(1)(B) of Title 21 of the United States Code.

Overt Acts

17. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed:

a. On or about December 18, 2004, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," the defendant, had a telephone conversation in which he discussed, among other things, a shipment of approximately 1300 kilograms of cocaine.

b. On or about December 18, 2004, in the Dominican Republic, TIRSO CUEVAS NIN and LIDIO ARTURO NIN TERRERO drove a vehicle containing approximately 1300 kilograms of cocaine.

(Title 21, United States Code, Section 963).

COUNT FIVE

The Grand Jury further charges:

18. In or about December 2004, in the Dominican Republic and elsewhere, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," TIRSO CUEVAS NIN, and LIDIO ARTURO NIN TERRERO, the defendants, unlawfully, intentionally, and knowingly did distribute a controlled substance, to wit, five kilograms and more of mixtures and substances containing a detectable amount of

cocaine, intending and knowing that such controlled substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States.

(Title 21, United States Code, Sections 952, 959(a)(1), (a)(2) and (c), 960(a)(3) & 960(b)(1)(B), and Title 18, United States Code, Section 2).

FORFEITURE ALLEGATION

19. As a result of committing one or more of the controlled substance offenses alleged in Counts One and Two of this Indictment, QUIRINO ERNESTO PAULINO CASTILLO, a/k/a "El Don," LUIS EDUARDO RODRIGUEZ CORDERO, a/k/a "Principe," LUIS DAVID ULLOA, a/k/a "Junior," JEAN PAUL ULLOA, BLADIMIR GARCIA JIMENEZ, "Vladi," JUAN SAMUEL RODRIGUEZ CORDERO, a/k/a "Sammy," FEDERICO MIRANDA HERNANDEZ, a/k/a "Fede," and JOSE ORTEGA DELEON, a/k/a "Chico," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. §853, any and all property constituting and derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used to facilitate the commission of the violations alleged in Counts One and Two of this Indictment, including, but not limited to, the following:

a. MONEY JUDGEMENT. Approximately $7,000,000 in U.S. currency, representing the amount of proceeds obtained as a result of the offense(s), for which the defendants are jointly and severally liable with any and all co-conspirators.

Substitute Asset Provision

20. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853)

3/15/05

FOREPERSON

DAVID N. KELLEY
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

QUIRINO ERNESTO PAULINO CASTILLO,
a/k/a "El Don,"
LUIS EDUARDO RODRIGUEZ CORDERO
a/k/a "Principe,"
LUIS DAVID ULLOA,
a/k/a "Junior,"
JEAN PAUL ULLOA,
BLADIMIR GARCIA JIMENEZ
a/k/a "Vladi,"
JUAN SAMUEL RODRIGUEZ CORDERO,
a/k/a "Sammy,"
FEDERICO MIRANDA HERNANDEZ
a/k/a "Fede,"
JOSE ORTEGA DELEON,
a/k/a "Chico,"
JUAN CRUZ CRISOSTOMO,
RAMON PEREZ FERRERAS,
FATIMA HENRIQUEZ DIAZ,
FAUSTINO PEROSO,
a/k/a "Ventura,"
MARCOS TAVERAS JIMENEZ,
JOSE ABEL BURDIEZ DELEON,
RICHARD MEJIA PENA,
TIRSO CUEVAS NIN, and
LIDIO ARTURO NIN TERRERO,

Defendants.

SUPERCEDING INDICTMENT

S7 04 Cr. 1353 (KMW)

(Title 21, United States Code, Sections 846, 853, 959, 963 and Title 18, United States Code, Sections 1956(h) and 2)

DAVID N. KELLEY
United States Attorney.

A TRUE BILL

3/15/05

Foreperson.